

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Peter D. Protopapas, as the Receiver for
Payne & Keller Company,

Plaintiff,

vs.

American International Group; Zurich
American Insurance Company; Travelers
Casualty & Surety Company, formerly
known as Aetna Casualty & Surety
Company; Continental Insurance
Company; National Union Fire Insurance
Company of Pittsburgh; Medmarc Casualty
Insurance Company; Berkshire Hathaway
Specialty Insurance Company, formerly
known as Stonewall Insurance Company;
Lexington Insurance Company; Hartford
Accident and Indemnity Company; Certain
Underwriters at Lloyd's of London and
Various London Market Companies; South
Carolina Property and Casualty Guaranty
Association; R.L Jarrett (Underwriting)
Agency, Inc.; and U.S. Risk, LLC,

Defendants.

Civil Action No. 3:21-cv-04086-JMC

**MOTION TO WITHDRAW
AS COUNSEL**

Pursuant to the Federal Rules of Civil Procedure and Local Civ. Rule 83.I.07 (D.S.C.), the law firm of Gallivan, White, Boyd, P.A. and its attorney James M. Dedman, IV move to withdraw as counsel for the following Defendants:

- Defendant Berkshire Hathaway Specialty Insurance Company, formerly known as Stonewall insurance Company;
- Certain as yet unnamed Underwriters at Lloyd's, London and Certain as yet unnamed London Market Companies;
- Lexington Insurance Company;
- National Union Fire Insurance Company of Pittsburgh, Pa.

Specifically, these Defendants have hired new counsel and wish for that new counsel, Wesley B. Sawyer of Murphy & Grantland, P.A., to represent them. As such, they consent to the withdrawal. Mr. Sawyer has filed a Notice of Appearance for these Defendants and, as such, these Defendants will be represented by him in the case going forward and will not be left unrepresented. These four Defendants have authorized this change in counsel. As such, Mr. Dedman and Gallivan, White, & Boyd, P.A. request that this Court relieve them of any and all duties arising from their prior representation of these Defendants and permit them to withdraw as counsel.

CONCLUSION

For the foregoing reasons, Mr. Dedman and Gallivan, White, & Boyd, P.A. request that this Court grant this motion.

Respectfully Submitted,

February 1, 2022

/s/ James M. Dedman, IV

 James M. Dedman, IV (SC Federal No. 9939)
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*Attorneys for Defendants
 Defendant Berkshire Hathaway Specialty Insurance
 Company, formerly known as Stonewall insurance
 Company;
 Certain as yet unnamed Underwriters at Lloyd's,
 London and Certain as yet unnamed London Market
 Companies;
 Lexington Insurance Company;
 National Union Fire Insurance Company of
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Defendants.

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CERTIFICATE OF SERVICE

Pursuant to Rule 5.02(A) of the Local Civil Rules for the U.S. District Court for the District of South Carolina, I certify that on February 1, 2022, I filed the foregoing document with the Court's Electronic Case Filing ("ECF") system. The act of filing this document with the Court's ECF system automatically generated a Notice of Electronic Filing ("NEF"), which constitutes proof of service of the filed document upon all registered users. As such, service has been accomplished through the NEF for parties and counsel who are registered users of the Court's ECF system.

Respectfully Submitted,

/s/ James M. Dedman, IV

James M. Dedman, IV (SC Federal No. 9939)

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Attorneys for Defendants

Defendant Berkshire Hathaway Specialty Insurance Company, formerly known as Stonewall insurance Company;

Certain as yet unnamed Underwriters at Lloyd's, London and Certain as yet unnamed London Market Companies;

Lexington Insurance Company;

National Union Fire Insurance Company of Pittsburgh, Pa.